

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
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In the Matter of

Amendment of Section 2.106 of )  
the Commission's Rules to )  
Allocate Spectrum for )  
Wind Profiler Radar Systems )

ET Docket No. 93-59  
RM-8092

To: The Commission

REPLY COMMENTS OF CLAIRCOM COMMUNICATIONS GROUP, L.P.

Claircom Communications Group, L.P. ("Claircom"), by its attorneys and pursuant to Section 1.415 of the Commission's Rules, 47 C.F.R. § 1.415 (1992), hereby submits its reply comments in response to the Notice of Proposed Rule Making and Notice of Inquiry ("NPRM") in the above-captioned proceeding. Claircom is one of six permittees authorized to provide commercial 800 MHz air-to-ground radio telephone service on a nationwide basis. Pursuant to this authorization, Claircom has initiated and is currently providing nationwide air-to-ground service. The NPRM proposes to allocate spectrum at 449 MHz for wind profile radar systems and solicits comments on whether such systems also should be accommodated at 915 MHz. Claircom's reply comments in this proceeding are limited to the proposal to allocate spectrum at 449 MHz for wind profile radar systems.

The NPRM analyzes the potential for interference caused by wind profile radar systems to existing operations in the 448-450 MHz band and proposes measures to protect these existing operations from such interference. For example, with respect to

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military operations in the 448-450 MHz band, the Commission has proposed that wind profiler locations be pre-coordinated with the existing military services; that wind profiler operations receive no protection from military mobile radiolocation stations; and that wind profiler stations provide protection to military mobile radiolocation stations that are engaged in critical national defense operations. NPRM, ¶ 11. The NPRM similarly analyzes the interference potential and proposed remedies therefor with respect to amateur operations in the 448-450 MHz band and remote pickup broadcast stations operating in the 450-451 MHz band.

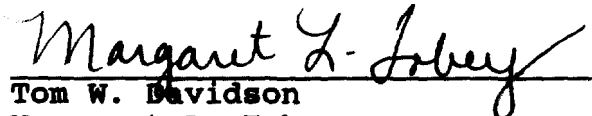
Claircom believes it is appropriate and necessary for the Commission to analyze the interference potential of its spectrum allocation proposal in this proceeding. However, Claircom also believes that the Commission's undertaking in that regard is incomplete because it has not considered the potential of wind profiler systems operating at 449 MHz to cause harmful intermodulation products or harmonic interference in the air-to-ground frequency band (894-896 MHz) and the ground-to-air frequency band (849-851 MHz). Interference of any kind from the high-power wind profiler radar pulse would be very detrimental to the narrow-band (3 kHz) pilot channel and 6 kHz traffic

radar systems, it cannot now be determined that such harmful interference will not occur. Thus, the record in this proceeding is incomplete, and the Commission cannot conclude on the basis of the record that the proposed spectrum allocation is in the public interest. Accordingly, Claircom submits that the proposed allocation should not be adopted unless and until the record contains a technical showing demonstrating that operation of wind profile radar systems at 449 MHz will not cause harmful interference to air-to-ground radiotelephone systems.

Respectfully submitted,

CLAIRCOM COMMUNICATIONS GROUP, L.P.

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